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5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA
7

8 JOHN ABAD,)
9 Plaintiff,)
10 vs.) No.
11 EXPERIAN INFORMATION)
12 SOLUTIONS, INC.,)
13 Defendant.)

JURY DEMANDED

14 COMPLAINT

15 JURISDICTION

16 1. The jurisdiction of this Court attains pursuant to the
17 FCRA, 15 U.S.C. Section 1681(p), and the doctrine of supplemental
18 jurisdiction. Venue lies in the Southern Division of the Judicial
19 District of Nevada as Plaintiff's claims arose from acts of the
20 Defendant perpetrated therein.
21

22 PRELIMINARY STATEMENT

23 2. The Plaintiff brings this action for damages based upon
24 Defendant's violations of the Fair Credit Reporting Act, 15 U.S.C
25 § 1681 et seq. (hereinafter referred to as "FCRA"), and of state
26 law obligations brought as supplemental claims.
27
28

LAW OFFICES

MITCHELL D. GLINER
3017 W. Charleston Blvd.
Suite 95
Las Vegas, Nevada 89102

(702) 870-8700

1 3. Plaintiff is a natural person and is a resident and
2 citizen of the State of Nevada and of the United States. Plaintiff
3 is a "consumer" as defined by § 1681a(c) of the FCRA.

4 4. The Defendant Experian Information Solutions, Inc.,
5 ("Experian"), is a corporate entity licensed to do business in the
6 State of Nevada.

7 5. Experian is a consumer reporting agency, as defined in
8 FCRA § 1681(f), regularly engaged in the business of assembling,
9 evaluating, and dispensing information concerning consumers for the
10 purpose of furnishing consumer reports, as defined in § 1681a(d) of
11 the FCRA, to third parties.

12 FACTUAL ALLEGATIONS

13 6. Plaintiff's creditworthiness has been repeatedly
14 compromised by the acts, obduracy and general indifference of the
15 Defendant.

16 7. Defendant reported 9 adverse credit entries on Plaintiff's
17 June 14, 2007, credit profile (Exhibit 1).

18 7. None were Plaintiff's.

19 9. Importantly, neither Equifax nor Trans Union - Defendant's
20 national competitors - report, or have reported any of the 9
21 adverse accounts.

22 10. Plaintiff disputed the 9 entries with Defendant.

23 11. Defendant removed all but the Aargon collection account
24 (Exhibit 2).

25 12. The presence of the collection account has impeded
26 Plaintiff's access to mortgage financing.

STATEMENT OF CLAIM AS AGAINST DEFENDANT

13. In the entire course of its action, Defendant willfully and/or negligently violated the provisions of the FCRA in the following respects:

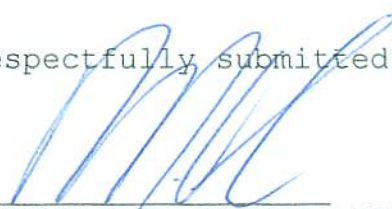
- a. By willfully and/or negligently failing, in the preparation of the consumer reports concerning Plaintiff, to follow reasonable procedures to assure maximum possible accuracy of the information in the reports.
- b. By willfully and/or negligently failing to comport with FCRA § 1681i.

PRAYER FOR RELIEF

THEREFORE, Plaintiff prays that the court grant the following relief as against Defendant:

- a) actual damages;
- b) punitive damages;
- c) attorney's fees; and
- d) costs.

Respectfully submitted,


MITCHELL D. GLINER, ESQ.
Nevada Bar #003419
3017 W. Charleston Blvd., #95
Las Vegas, NV 89102
Attorney for Plaintiff

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**Online Personal Credit Report from
Experian for**

Experian credit report prepared for
JOHN ABAD
Your report number is
1772725199
Report date:
06/14/2007

1800 4931058
Nancy

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Print report

Experian collects and organizes information about you and your credit history from public records, your creditors and other reliable sources. Experian makes your credit history available to your current and prospective creditors, employers and others as allowed by law, which can expedite your ability to obtain credit and can make offers of credit available to you. We do not grant or deny credit; each credit grantor makes that decision based on its own guidelines.

To return to your report in the near future, log on to www.experian.com/consumer and select "View your report again" or "Dispute" and then enter your report number.

If you disagree with information in this report, return to the Report Summary page and follow the instructions for disputing.

Potentially Negative Items[back to top](#)**Credit Items**

Nancy

For your protection, the last few digits of your account numbers do not display.

1 AARGON AGENCY INC

Address: Account Number: Original Creditor:
3025 W SAHARA AVE 2011084536 NEVADA POWER
LAS VEGAS, NV 89102
No phone number available
Status: Collection account. \$113 past due as of Jun 2007.

Status Details: This account is scheduled to continue on record until Jul 2013.

Date Opened:	Type:	Credit Limit/Original Amount:
04/2007	Collection	\$112
Reported Since:	Terms:	High Balance:
01/2007	NA	NA
Date of Status:	Monthly Payment:	Recent Balance:
01/2007	\$0	\$113 as of 06/2007
Last Reported:	Responsibility:	Recent Payment:
06/2007	Individual	\$0

8694

Account History:
Collection as of Jun 2007, Jan 2007

2 BANK OF AMERICA

Address: Account Number:
PO BOX 1390 480011599946....
NORFOLK, VA 23501
(800) 441-0130
Status: Account charged off/Past due 150 days. \$5,141 written off. \$1,768 past due as of May 2007.

Status Details: This account is scheduled to continue on record until Oct 2010.

Date Opened:	Type:	Credit Limit/Original Amount:
08/2003	Revolving	\$4,000
Reported Since:	Terms:	High Balance:
09/2003	NA	\$6,477
Date of Status:	Monthly Payment:	Recent Balance:
06/2004	\$0	\$2,211 as of 05/2007

EXHIBIT 1

Last Reported:
05/2007

Responsibility:
Individual

Recent Payment:
\$0

Creditor's statement: Account closed at credit grantor's request.

Account History:

Charge Off as of May 2007, Apr 2007, Mar 2007, Feb 2007, Jan 2007, Dec 2006, Nov 2006, Oct 2006, Sep 2006, Aug 2006, Jul 2006, Jun 2006, May 2006, Apr 2006, Jul 2004, Jun 2004
150 days as of May 2004
120 days as of Apr 2004
90 days as of Mar 2004
60 days as of Feb 2004
30 days as of Jan 2004

Balance History:

04/2007 \$2,157
03/2007 \$2,105
02/2007 \$2,050
01/2007 \$2,003
12/2006 \$1,953
11/2006 \$1,905
10/2006 \$1,858
09/2006 \$1,814
08/2006 \$1,768
07/2006 \$1,723
06/2006 \$1,681
05/2006 \$1,639
04/2006 \$1,599

Between Apr 2006 and Apr 2007, your credit limit/high balance was \$4,000

3 BENEFICIAL/HFC

Address:
PO BOX 1547
CHESAPEAKE, VA 23327
No phone number available

Account Number:
6817020062....

Status: Transferred,closed/Account charged off. \$4,033 written off.

Date Opened:

09/2003

Reported Since:

09/2003

Date of Status:

12/2006

Last Reported:

12/2006

Type:

Installment

Terms:

1 Months

Monthly Payment:

\$0

Responsibility:

Individual

Credit Limit/Original Amount:

\$3,940

High Balance:

NA

Recent Balance:

NA

Recent Payment:

NA

Creditor's statement: Purchased by another lender.

Account History:

Charge Off as of Aug 2006 to Dec 2006, Apr 2006 to Jun 2006, Nov 2004
Collection as of Jun 2005 to Mar 2006, Jan 2005 to Apr 2005
180 days as of Jul 2004 to Oct 2004
150 days as of Jun 2004
120 days as of May 2004
90 days as of Apr 2004
60 days as of Mar 2004
30 days as of Feb 2004

4 BENEFICIAL/HFC

Address:
PO BOX 1547
CHESAPEAKE, VA 23327
No phone number available

Account Number:
6817020062....

Status: Paid in settlement/Account charged off. \$5,577 written

Status Details: This account is scheduled to continue on record

off.

until Nov 2010.

Date Opened:	Type:	Credit Limit/Original Amount:
11/2003	Installment	\$7,702
Reported Since:	Terms:	High Balance:
11/2003	1 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
07/2006	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
07/2006	Individual	NA

Creditor's statement: Account legally paid in full for less than full balance.

Account History:

Charge Off as of Apr 2006 to Jun 2006, Nov 2004
 Collection as of Jun 2005 to Mar 2006, Jan 2005 to Apr 2005
 180 days as of Jul 2004 to Oct 2004
 150 days as of Jun 2004
 120 days as of May 2004
 90 days as of Apr 2004
 60 days as of Mar 2004
 30 days as of Feb 2004

5 CITI

Address: Account Number:
 PO BOX 6241 542418083365....
 SIOUX FALLS, SD 57117
 No phone number available
 Status: Paid/Closed/Account charged off. \$7,452 written off.

Date Opened:	Type:	Credit Limit/Original Amount:
08/2002	Revolving	\$5,790
Reported Since:	Terms:	High Balance:
08/2002	NA	\$9,481
Date of Status:	Monthly Payment:	Recent Balance:
10/2005	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
10/2005	Individual	NA

Creditor's statement: Account closed at credit grantor's request.

Account History:

Charge Off as of Jul 2004 to Sep 2005, Jun 2004
 150 days as of May 2004
 120 days as of Apr 2004
 90 days as of Mar 2004
 60 days as of Feb 2004

Balance History:

09/2005 \$0
 08/2005 \$0
 07/2005 \$0
 06/2005 \$0

Between Jun 2005 and Sep 2005, your credit limit/high balance was \$5,790

6 COMMUNITY ONE FCU

Address: Account Number:
 2699 N TENAWAY 427506030000....
 LAS VEGAS, NV 89125
 No phone number available
 Status: Open/Current, was past due 30 days.

Status Details: As of Jan 2014, this account is scheduled to go to a positive status.

Date Opened:	Type:	Credit Limit/Original Amount:
10/1999	Revolving	\$2,500
Reported Since:	Terms:	High Balance:
05/2001	NA	\$2,614
Date of Status:	Monthly Payment:	Recent Balance:
05/2007	\$77	\$2,558 as of 05/2007
Last Reported:	Responsibility:	Recent Payment:
05/2007	Joint with MINERVA D ABAD	\$200

Account History:
30 days as of Apr 2007, Feb 2007, Nov 2006

Balance History:

04/2007 \$2,565
03/2007 \$2,528
02/2007 \$2,614
01/2007 \$2,577
12/2006 \$2,550
11/2006 \$2,559
10/2006 \$2,523
09/2006 \$2,472
08/2006 \$2,384
07/2006 \$2,519
06/2006 \$2,144
05/2006 \$2,018
04/2006 \$1,839
03/2006 \$1,546
02/2006 \$1,728
01/2006 \$1,909
12/2005 \$2,087
11/2005 \$1,955
10/2005 \$1,799
09/2005 \$1,934
08/2005 \$1,087
07/2005 \$216
06/2005 \$135

Between May 2006 and Apr 2007, your credit limit/high balance was \$2,500

Between Aug 2005 and Apr 2006, your credit limit/high balance was \$2,000

Between Jun 2005 and Jul 2005, your credit limit/high balance was \$1,500

7 COUNTRYWIDE HOME LOANS

Address: Account Number:
450 AMERICAN STREET 2297....
SIMI VALLEY, CA 93065
(800) 669-6607
Status: Paid,Closed/Current, was past due 30 days.

Date Opened:	Type:	Credit Limit/Original Amount:
08/2003	Mortgage	\$134,550
Reported Since:	Terms:	High Balance:
11/2003	30 Years	NA
Date of Status:	Monthly Payment:	Recent Balance:
05/2005	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
05/2005	Individual	NA

Account History:
30 days as of Nov 2004, Jan 2004

4 LITTON LOAN SERVICING

Address: Account Number:
4828 LOOP CENTRAL DR 0000000001463....
HOUSTON, TX 77081
No phone number available
Status: Paid,Closed/Foreclosure proceedings started.

Date Opened:	Type:	Credit Limit/Original Amount:
04/2005	Mortgage	\$231,000
Reported Since:	Terms:	High Balance:
12/2005	30 Years	NA
Date of Status:	Monthly Payment:	Recent Balance:
03/2006	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
03/2006	Joint with MINERVA D ABAD	NA

Account History:
Foreclosure proceedings started as of Feb 2006, Jan 2006
90 days as of Dec 2005

WELLS FARGO BANK

Address: Account Number:
PO BOX 5445 549096019057....
PORTLAND, OR 97228
(877) 778-5697

Status: Account charged off/Past due 180 days. \$4,156 written off. \$1,582 past due as of Jun 2007.

Status Details: This account is scheduled to continue on record until May 2013.

Date Opened:	Type:	Credit Limit/Original Amount:
09/1998	Revolving	\$3,200
Reported Since:	Terms:	High Balance:
08/2002	NA	\$4,156
Date of Status:	Monthly Payment:	Recent Balance:
02/2007	\$0	\$4,156 as of 06/2007
Last Reported:	Responsibility:	Recent Payment:
06/2007	Individual	\$0

Account History:
Charge Off as of Jan 2007 to Jun 2007
180 days as of Jan 2007
150 days as of Dec 2006
120 days as of Nov 2006
90 days as of Oct 2006
60 days as of Sep 2006
30 days as of Aug 2006

Balance History:

05/2007 \$4,156
04/2007 \$4,156
03/2007 \$4,156
02/2007 \$4,156
01/2007 \$4,156
12/2006 \$4,156
11/2006 \$4,156
10/2006 \$3,995
09/2006 \$3,811
08/2006 \$3,611
07/2006 \$3,430
06/2006 \$3,376
05/2006 \$3,091
04/2006 \$3,229
03/2006 \$3,350
02/2006 \$3,429
01/2006 \$3,477
12/2005 \$3,325
11/2005 \$3,093
10/2005 \$3,261
09/2005 \$3,115
08/2005 \$3,025
07/2005 \$677
06/2005 \$40

Between Jun 2005 and May 2007, your credit limit/high balance was \$3,200

Accounts in Good Standing[back to top](#)**AMEX**

Address:
PO BOX 297812
FT LAUDERDALE, FL 33329
(800) 528-2122
Status: Open/Never late.

Account Number:
877456780011371707

Date Opened:	Type:	Credit Limit/Original Amount:
11/2006	Revolving	\$5,000
Reported Since:	Terms:	High Balance:
05/2007	NA	\$3,620
Date of Status:	Monthly Payment:	Recent Balance:
05/2007	\$0	\$3,620 as of 05/2007
Last Reported:	Responsibility:	Recent Payment:
05/2007	Individual	\$0

Balance History:

04/2007 \$3,146
03/2007 \$3,053
02/2007 \$2,874
01/2007 \$330

Between Jan 2007 and Apr 2007, your credit limit/high balance was \$5,000

BANK OF AMERICA

Address:
201 N TRYON ST
CHARLOTTE, NC 28255
No phone number available
Status: Paid,Closed/Never late.

Account Number:
6501000057....

Status Details: This account is scheduled to continue on record until Feb 2015.

Date Opened:	Type:	Credit Limit/Original Amount:
05/2003	Installment	\$24,013
Reported Since:	Terms:	High Balance:
06/2003	60 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
02/2005	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
02/2005	Individual	NA

~~CHASE~~

Address:
800 BROOKSEGE BLVD
WESTERVILLE, OH 43081
(800) 955-9900
Status: Paid,Closed/Never late.

Account Number:
514922427006....

Status Details: This account is scheduled to continue on record until Jun 2017.

Date Opened:	Type:	Credit Limit/Original Amount:
04/2004	Revolving	\$3,000
Reported Since:	Terms:	High Balance:
04/2004	NA	\$2,989
Date of Status:	Monthly Payment:	Recent Balance:
06/2007	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
06/2007	Individual	NA

Creditor's statement: Account closed at credit grantor's request.

Balance History:
05/2007 \$0


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Online Personal Credit Report from Experian for

Experian credit report prepared for
JOHN ABAD
 Your report number is
1772725199
 Report date:
07/11/2007

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Potentially Negative Items

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Credit Items

For your protection, the last few digits of your account numbers do not display.

AARGON AGENCY INC

Address:
 3025 W SAHARA AVE
 LAS VEGAS, NV 89102
No phone number available

Account Number:
 2011084536

Original Creditor:
 NEVADA POWER

Status: Collection account. \$113 past due as of Jun 2007.

Status Details: This account is scheduled to continue on record until Jul 2013.
 This item was verified on Jul 2007 and remained unchanged.

Date Opened:	Type:
04/2007	Collection
Reported Since:	Terms:
01/2007	NA
Date of Status:	Monthly Payment:
01/2007	\$0
Last Reported:	Responsibility:
06/2007	Individual

Credit Limit/Original Amount:
 \$112
 High Balance:
 NA
 Recent Balance:
 \$113 as of 06/2007
 Recent Payment:
 \$0

Account History:
 Collection as of Jun 2007, Jan 2007

Accounts in Good Standing

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AMEX

Address:
 PO BOX 297812
 FT LAUDERDALE, FL 33329
 (800) 528-2122
 Status: Open/Never late.

Account Number:
 877456780011371707

Date Opened:	Type:
11/2006	Revolving
Reported Since:	Terms:

Credit Limit/Original Amount:
 \$5,000
 High Balance:

EXHIBIT 2